

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE



Jonathan Leite,
Plaintiff

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v.

Civil No. 15-cv-00280-PB

Matthew Goulet *et al.*,
Defendants

AFFIDAVIT OF HEATHER MARQUIS

I, Heather Marquis, upon oath do hereby depose and state as follows:

1. I worked for the New Hampshire Department of Corrections at the Northern New Hampshire Correctional Facility ("NCF") from 2005 to 2013. I make this affidavit based on my personal knowledge.

2. My job responsibilities at NCF on August 24, 2012 did not involve either conducting rounds or counts on F-block. I did not participate in any rounds or counts on F-block on August 24, 2012.

3. It is my understanding that I was the secondary officer in the Central Control room at NCF on August 24, 2012. Although Central Control has access to all of the facility's cameras, my job responsibilities would not have involved focusing on the video showing the activities of the inmates on the housing units. Rather, I would have been monitoring and facilitating individuals' entrance and exit to the prison, the perimeter of the prison, and the movement of staff and inmates through the locked entry points within the area surrounding central control, among other tasks not related to video monitoring.

4. I do not recall viewing the inmate housing units via the Central Control monitors on August 24, 2012. Had I viewed these housing units on August 24, 2012, and had I seen anything that suggested to me that there was a safety concern on a unit, I would have requested officers' report to the unit.

5. At no point on or prior to August 24, 2012 was I informed by an inmate Leite or any other individual that Mr. Liete was at risk of an assault or any other harm.

6. I did not work visits on August 24, 2012 and I have never escorted an inmate to a visit, as that is not NCF procedure.

7. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Date: October 11, 2017

s/Heather Marquis
Heather Marquis